ACUSHNET COMPANY

RECEIVED

JAN 1 8 1985

January 18, 1985

SUPERFUND BRANCH

Ms. Heather Ford Chief, Enforcement and Cost Recovery Section Waste Management Division U.S. Environmental Protection Agency J.F.K. Federal Building, Room 1907 Boston, Massachusetts 02203

Dear Ms. Ford:

We are writing in response to Mr. Merrill Hohman's November 21, 1984 letter to Mr. Maurice Barnett, formerly Vice President of Manufacturing of Acushnet Company - Rubber Division, requesting information pertaining to the New Bedford Superfund site, New Bedford, Massachusetts. We appreciate your January 2, 1985 letter providing us with additional information and for the understanding you displayed in that correspondence and in your January 11, 1985 telephone conversation with Gilbert L. Klemann, II, Esq., an attorney with Chadbourne, Parke, Whiteside and Wolff, who represents us.

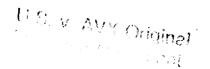
We have extensively reviewed our records and have contacted many present and former employees to obtain the requested information. In summary, there is no indication that we are in any way responsible for the contamination of the Acushnet River or New Bedford harbor with heavy metals or polychlorinated biphenyls.

Our replies to the specific questions submitted by Mr. Hohman in his letter of November 21, 1984 are as follows:

Question 1:

"The waste stream referred to in Form 3, Section IV, Line 6 of the RCRA Permit Application is indicative of a material that exhibits the characteristic of EP toxicity. Detail the materials represented by the hazardous waste number D000 by referring to 40 CFR, Part 261.24, Table 1 or other description of the material as appropriate. Please include any available information on the practices which have historically been used for disposal of this material."

continued....





Ms. Heather Ford

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January 18, 1985

Answer to Question 1:

We filed two RCRA permit applications on November 19, 1980: one for our building at 192 Riverside Avenue where we manufacture rubber o-ring and polyurethane products and a second for our building at 744 Belleville Avenue where we custom mold rubber products. Both applications were returned to us by the EPA in December 1983 because we do not treat, store or dispose of any hazardous wastes. We mistakenly inserted "D000" on Form 3, Section IV, line 6 of our permit application for 744 Belleville Avenue in the event we would begin storing hazardous waste in the future.

We have not generated, treated, stored, used or disposed of any of the materials with the EP toxicity characteristic described in 40 C.F.R., Part 261.24.

Question 2:

"Give any records of direct discharge of heavy metals into the New Bedford harbor, which occurred before the submission of any NPDES or RCRA permit application and have not otherwise been submitted to EPA."

Answer to Question 2:

We have no record of, and none of the former or present employees whom we contacted concerning Mr. Hohman's November 21, 1984 letter could recall, any incident of our discharging heavy metals into the New Bedford harbor at any time.

Question 3:

"Detail the area in which materials were stored on-site before the issuance of Notice of Violation, 315 CMR 2.00, June 19, 1981, and give any records of accidental spills occurring in the storage area."

Answer to Question 3:

We have no record of, and none of the former or present employees whom we contacted concerning Mr. Hohman's November 21, 1984 letter could recall, any time during which we stored waste materials outside any building other than the areas described in our two RCRA permit applications (see attached Appendix \underline{A}).



Ms. Heather Ford

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January 18, 1985

We have been unable to locate any record of accidental spills in the waste storage areas.

Several employees recalled that in approximately 1973, the driver of a fuel oil delivery truck fell asleep and allowed oil to overflow into a catch basin which extends through the waste storage area at 744 Belleville Avenue, New Bedford, Massachusetts and into the river. The fuel oil vendor provided a containment boom and cleanup services, which were monitored by the Coast Guard. We have no records concerning this incident.

Question 4:

"Detail the shipment of polychlorinated biphenyls (Aroclor 1252) made by Monsanto Corporation to Acushnet Process in 1971 and recorded in a Monsanto Product/Customer Sales Report of January 12, 1972, and any other shipments made by a supplier of PCB's. In particular, please indicate the use of such PCB's, and the disposal method of any PCB wastes resulting from such use. Finally, please indicate any uses of PCB's either present or past at any Acushnet Company facility in New Bedford."

Answer to Question 4:

Dr. John Craddock of Monsanto Corporation informed us by telephone that Monsanto does not make a product named "Aroclor 1252." Dr. Craddock's staff reviewed their records and found a document similar to the one that you provided to us with your letter of January 2 (Appendix B). The number 1252 on the left hand side of the page is a product code according to Dr. Craddock, and the actual Monsanto product referred to is "Therminal 55", a heat transfer fluid which does not contain PCB's.

In reviewing our records, we located a "traveling requisition" (Appendix C) which details several purchases of Monsanto's "Aroclor 1254", a PCB oil. The total cumulative amount of "Aroclor 1254", or any other PCB-containing material, that we have ever purchased apparently does not exceed 25 gallons. According to the traveling requisition, we obtained five gallons (50 pounds) of this material from the Aerovox Corporation on January 22, 1963. We purchased three additional 50 or 60 pound quantities of "Aroclor 1254" from Monsanto in March 1966, May 1967 and February 1968 (Appendix C). All four batches of the "Aroclor 1254" were purchased by our Elastacast polyurethane manufacturing department, located at 192 Riverside Avenue.

continued....

A thorough search of our formulation records showed no use of "Aroclor 1254", or any other PCB material, in production parts, but a former Elastacast plant manager expressed the belief that it was an ingredient in a polyurethane formulation used to manufacture parts for Pratt and Whitney Aircraft Company. However, the chemist who worked on those projects (also a former employee) and who reportedly used the "Aroclor 1254" had no recollection of this product.

-4-

Beginning on January 22, 1963, however, we have records indicating the use of "Aroclor 1254" in experimental compounds (Apendices D and E are samples of these records). As a component in experimental formulations, the "Aroclor 1254" would probably have been shipped to prospective customers in the form of sample parts, or, if not used, would have eventually been disposed of through outside contractors. We have no record of the actual shipments or disposal. However, Monsanto informed us that we returned one 60 pound can of Aroclor 1254 to Monsanto for incineration in 1973. (Appendix F).

The only other known presence of PCB's on our property is in an electrical transformer. As shown by the attached purchase order (Appendix \underline{G}), the Acushnet Company purchased transformers and switch gear from our local electric utility (now Commonwealth Electric) in October of 1968. This equipment had previously been installed and owned by the utility, but we purchased it to obtain a reduced electrical rate. This transformer was replaced in September 1984 and is currently stored at the waste storage area at 744 Belleville Avenue. The transformer contains approximately 400 gallons of PCB oil. We are preparing to contract with Three-C Electrical Testing Company (Appendix \underline{H}) to dispose of both the PCB oil and the transformer shell.

Very truly yours,

Acushnet Company, Rubber Division

Walter L. Reid, Jr.

Plant Engineering Manager

Attachments



Ms. Heather Ford

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January 18, 1985

I, Walter L. Reid, Jr., Plant Engineering Manager of Acushnet Company, Rubber Division, hereby certify that a diligent record search has been completed and that all information responsive to Merrill S. Hohman's November 21, 1984 letter to Maurice Barnett, formerly of Acushnet Company, is forwarded herewith to the EPA.

Walter L. Reid, Jr.

Sworn to before me this day of January 18, 1985

Henry Robelle Notany Public *. FACILITY DRAWING (see page 4) APPENDIX A PROPERTY LIME 455' PAGE 1 OF 2 BULLDING B 744 BELLEVILLE AUA BOILER 568 683 SCALE /" = 75' Land AVK Original INSIDE STORAGE OUTSIDE STOR AGE 33'x20' FENCE ACUSHNET x x x x x MEAN HIGH WATER FILLED AREA PROPERTY LIHE 230'

EPA Form 3510-3 (6-80)

PAGE 5 OF 5

APPENDIK B

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APPENDIX D

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APPENDIX E

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Split Tear	272	244	189	103	142	12
Sp.Gr.	1.14	1.17	1.2/	1,23	1,29	1.1
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Mold Cure Oven Cure						
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To Al on 119/63 y Tot + Tol. 212 man #

APPENDIX F

Monsanto

Monsanto Company 800 N. Lindbargh Boulevard St. Louis, Missouri 63167 Phone: (314) 694-1000

January 8, 1985

Mr. Walter L. Reid Acushnet Company Rubber Division P.O. Box E916 New Bedford, MA 02742

Dear Mr. Reid:

In response to your letter of December 11 and subsequent phone discussions, I am enclosing the results of our search of previous sales records regarding Acushnet purchases from Monsanto for the years 1971 and 1972.

Again let me state, there is no such product - Aroclor® 1252. The number "1252" in this record refers to a sales location area not a product.

Also, the product Therminol® 55 is <u>not</u> and was <u>not</u> a polychlorinated biphenyl material. As a matter of fact, it is a replacement product for former PCB heat transfer fluid formulations.

I hope this answers your questions.

Sincerely,

John H. Craddock, Ph.D. Product and Environmental

Safety Director

/dkr Enclosure

U.S. V. All Andrage

Acushnet Company Inquiry of
December 11, 1984
TO John H. Craddock - G3WG

This will respond to your memorandum requesting information on the inquiry of Acushnet Company under letter to you dated December 11, 1984.

A review of our sales summary records for the years 1971 and 1972 for sales of Aroclor 1254 to Acushnet Company of Massachusetts was negative. We show only one 1971 sale to it of 390 pounds of Therminol 55. I am enclosing a copy of the sales summary page showing this 1971 Therminol sale as excerpted from our 1972 summaries under the "Last Year Sales" column. Please note the first numerical entry "1252" on ths page. It is our understanding that these digits represent a sales location area and not a product. This may explain the discrepancy noted in the EPA request for Aroclor 1252.

Our records do show that Acushnet Company returned one 60 pound can of Aroclor 1254 "waste" to Monsanto for incineration in the fall of 1973. We can only assume that this is waste from the earlier purchases of Aroclor 1254-Electric Grade made by Achushnet in the 1960s from either Monsanto or Aerovox as referenced on the purchase record of Mr. Reid attached to his letter to you.

Please advise me if I can be of further assistance.

And William

L. M.

REPORT B1476-A NO.4 CUSTOWER/PRODUCT SALES REPORT FOR DEC 1972 - IN ACTUAL PRIMOS AND DOLLARS	MICC DIV-C2 MO.4 CUSTOMER/PROD -IN ACTUAL	SPECIALTY PROCUCTS IUCT SALES REPORT FOR D	SEC 1972		PAGE 83	
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U.S. v. Ava Calabast Lingation Decrees

APPENDIX # G

REQUISITIONER RECEIVING REPORT ACUSHNET COMPANY

P.O. BOX E916, NEW BEDFORD, MASS. 02742

INVOICING INSTRUCTIONS

SELLER AGREES IN CONNECTION WITH THE PRODUCTION OF THE ARTICLES AND OR THE PERFORMANCE OF THE SERVICES SPECIFIED HEREIN, HAS FULLY COMPLIED WITH THE PROVISIONS OF THE FAIR LABOR ACT OF 1938; AS AMENDED, AND THE PROVISIONS OF THE WALSH-MELEY ACT, AS AMENDED, INSOFAR AS THEY ARE APPLICABLE, AND MUST SO CERTIFY ON HIS INVOICE.

NON-ASSIGNMENT, UNLESS EXPRESS WRITTEN CONSENT IS GIVEN BY THE BUYER, THIS PURCHASE ORDER OR ANY ACCOUNT RESULTING THEREFROM IS NON-ASSIGN

ATTACH TRANSPORTATION RECEIPT WHEN CHARGES AFFEAR ON INVOICE.
MAIL ALL INVOICES IN DUPLICATE AT TIME OF SHIPMENT TO:

•					
DATE TO BE DEL'V'D.	SHIP VIA	F. O. B.	REQUISITION NO. AND DEPT.	ACCOUNT NO.	DATE OF ORDER
COCR		"PREPAY TRANSPORTATION"	35968 Elebeste	8012425	10/10/68

PLEASE ENTER OUR ORDER FOR GOODS LISTED BELOW AND ACKNOWLEDGE AT ONCE ADVISING SHIPPING DATE

PURCHASE ORDER NO.

THIS ORDER NO. MUST APPEAR ON ALL INVOICES, PACKAGES, SHIPMENT PAPERS AND CORRESPONDENCE.

w Bodfrd Gas & Edison Light Co. Purchase St.

VENDOR CODE 27824	B14217
127	

DO NOT MAKE PARTIAL SHIPMENTS

REG. NO. 041-014-360 EXEMPT USE CERTIFICATE APPLIES

ANO. QUANTITY	CODE	PECTION REQUIRED ATTACHED DESCRIPTION	PRICE
	Purch et 31 Agus 1 -	des transformers & associated equip des. A - B - C es fellows, MET A 1300 KVA West. Transformer 3-phase 13.2KV S/N 7023106 installation sost of same1964. Puse bolder (installed cost) Cutouts 12KV lightining aresters (insettle soot)	\$5,824.42 \$ 921.52 \$ 65.91 \$ 82.94 \$ 227.16
DATE	DATE O	ON PAGE I	\$ 250.24



F. O. B.

PREPAY TRANSPORTATION PLEASE ENTER OUR ORDER FOR GOODS LISTED BELOW AND ACKNOWLEDGE AT ONCE ADVISING SHIPPING DATE

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INVOICING INSTRUCTIONS

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NON-ASSIGNMENT, UNLESS EXPRESS WRITTEN CONSENT IS GIVEN BY THE BUYER, THIS PURCHASE ORDER OR ANY ACCOUNT RESULTING THEREFROM IS NON-ASSIGNABLE BY THE SELLER.

PURCHASE ORDER NO. THIS ORDER NO. MUST APPEAR ON ALL INVOICES, PACKAGES, SHIPMENT PAPERS AND CORRESPONDENCE.

ATTACH TRANSPORTATION RECEIPT WHEN CHARGES APPEAR ON INVOICE MAIL ALL INVOICES IN DUPLICATE AT TIME OF SHIPMENT TO:

ACCOUNT NO.

VENDOR CODE

G.E. W. AVX Original Physica of Dogwood

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REQUISITION NO. AND DEPT.

35968 ELAS

NEW BEDFORE GAS AND EDISONATION COMPANY

CD-4-NB

8 693 PURCHASE STREET

SUNDRIES CASHIER'S COUPON

	BULL NO.	DATEOF	SOLD TO	DESCRIPTION	UNIT PRICE	TOTAL	
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4 4	& installation cost of same	
5 824.52 921.52 65.91 82.24	3 079.34	75.
PLANT "A" 1-1500 KVA West. transformer, 3-phase, 13.2KV S/N 7023106 -Install same- 3-Fuse holders (Installed cost) 3-Cutouts " "	1-2000/2300 KV West. transformer, 3-phase 13.2KV, S/N 5062568 -Installation cost of same-	1-1000 KVA GE transformer, 3-phase, 13.2 y, s/N 7151306 -No imstallation cost - Purchase in place.

NEW E. LOUGHT CO.

130/68

SELL THE FOLLOWING SUBSTREAM THUMSFORMERS AND OTHER EQUIPMENT, IN PLACE, TO THE ACCUMENT COMPANY

		1968
Description	Original Year	Depreciated Value
ACUSHNET "A"		
1- 1500 KVA West, transformer		
3-phase, 13.2KV, S/N 7023106	1964	\$ 5.824.42
Installation cost of same	1964	921.52
3- Fuse holders (Installed cost)	196h	65.91
3- Cutouts (" ")	196h	82.24
3- 12KV lightning arresters (Installed cost)	1964	2 27 . 16
ACUSHNET #2		
1- 2000/2300 KVA West. transformer		
3-phase, 13.2KV, S/N 5062568	1950	3,079.34
Installation cost of same	1955	250.24
1- 1000 KVA G.E. transformer		:
3-phase, 13.2KV, S/N 7151308	1956	•57
No installation costPurchased	i	
in place.	1	
ACUSHNET "C"		
1- 1500 KVA G.E. transformer		
3-phase, 13.2KV, S/N G-184136	1955	4,803.66
Installation cost of same	1960	193. 40
1- S&C 600 Amp., 14.4XV load		
break switch and		-c
installation cost of same.	1960	7 85 .3 0
		Continue to the continue of the con-
		\$ 16,233.76
		¥ 10,277.10

Pages

THREE-C ELECTRICAL TESTING CO.

High Voltage Testing/Maintenance/Engineering 190 Pleasant Street ASHLAND, MASSACHUSETTS 01721

(617) 881-3911 237-2444

APPENDIX & H

of

PROPOSAL SUBMITTED TO			PHONE	DATE
	ACUSHNET COMPANY		997-2811	November 12, 1984
STREET	740 Belleville Avenue New Bedford, MA		JOB NAME	
			Dispose of one (1) PCB oil filled transforme	
CITY, STATE AND ZIP CODE			JOB LOCATION	
			Building - Plant B	
ARCHITECT	Attention: Mr. Bob Gell	DATE OF PLANS	#0011	JOB PHONE
144	1 1 1 1 1	1		

We hereby submit specifications and estimates for:

Disposal of one (1) 1000KVA, PCB oil filled transformer per DEQE and EPA hazardous waste disposal regulations.

SCOPE OF WORK

Prepare manifest.

2. Drain PCB oil into D.O.T. drums, label and mark drums accordingly.

 Pump flush solvent into transformer, let stand for eighteen (18) hours, per EPA regulation.

4. Drain PCB contaminated flush solvent into D.O.T. drums, label and mark drums accordingly.

5. Transport PCB oil, PCB contaminated flush, and drained PCB transformer to disposal facility.

6. Once items have been disposed of properly, a completed generators copy and certificate of disposal will be issued.

TOTAL: \$10,495.00

मार भारामणहर hereby to furnish material and labor — c	complete in accordance with above specifications, for the sum of:
Ten thousand, four hundred , ninety-five . Payment to be made as follows:	dollars (\$ <u>10</u> ,495.00)
All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. Any alteration or deviation from above specifications involving extra costs will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, tornado and other necessary insurance.	Authorized Signature ALEXANUER R. PICCIOLT, General Manager Note: This proposal may be withdrawn by us if not accepted within

Arreptative of Proposal — The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Signature .